

EXHIBIT B

October 05, 2023

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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PATRICIA HARAN,

Plaintiff,

-against-

ORANGE BUSINESS SERVICES INC.,

Defendant.

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October 5th, 2023
10:03 a.m.

REMOTE DEPOSITION of ORANGE
BUSINESS SERVICES, INC., by ADAM OVERTON
KIMMICK, the Defendant in the
above-entitled action, taken on behalf of
the Plaintiff, held remotely via video
teleconference, taken before Stefanie
Calabria, a Reporter and Notary Public
within and for the State of New York.

October 05, 2023

1 A P P E A R A N C E S:

2
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1 A. KIMMICK

2 managing clients and the future of the

3 business and revenue.

4 Q. Did you hire Patty?

5 A. Yes.

6 Q. Did you set her rate of pay?

7 A. Yes.

8 Q. Did you assign her job duties?

9 A. Yes.

10 Q. Did you supervise her work?

11 A. Yes.

12 Q. Did she report to anyone else

13 other than you?

14 A. Not that I recall. And the

15 reason I say that is because I changed

16 jobs frequently and there were periods of

17 time where I had managers and managers and

18 so I don't believe so, but I wouldn't

19 testify under oath that that's the case.

20 MS. FISHER: Just bear with me,

21 I'm going to put a document in the

22 chat. Give me one second. It's not

23 loading. Give me one second.

24 Q. Do you see a document posted to

25 the chat window?

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1 A. KIMMICK

2 A. Yes.

3 Q. Did he meet his quota during
4 that time period?

5 A. I don't recall.

6 Q. Other than Ms. Haran, have you
7 terminated anyone else from your team from
8 2017 to present?

9 A. Yes.

10 Q. Who?

11 A. I don't recall all of them.
12 Certainly the people that were integration
13 service specialists. Jennifer Rossdale
14 was terminated for cause, I believe.
15 Boyne Kim was terminated for cause, I
16 believe. There were others.

17 Q. Do you recall the names of
18 anyone else?

19 A. Not at this time.

20 Q. Why was Jennifer Rossdale
21 terminated?

22 A. Under performance, and she had
23 issues with her client relationships and
24 some relationships with her piers, her
25 work was inconsistent.

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1 A. KIMMICK
2 terminate Jennifer Rossdale, did you
3 memorialize the basis for your decision in
4 any document?

5 A. I don't recall.

6 Q. When terminating Boyne Kim, did
7 you memorialize the basis for your
8 decision in any document?

9 A. I don't recall.

10 Q. Have you participated in any
11 training on discrimination in the
12 workplace at Orange?

13 A. Yes.

14 Q. How many times have you
15 participated in such training?

16 A. Once a year. I don't recall
17 when it started.

18 Q. When was the most recent
19 training you had?

20 A. October 7th of --

21 Q. Of 2022?

22 A. No, I did it yesterday or the
23 day before.

24 Q. So October 3rd or 4th?

25 A. What's the date today? It's the

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1 A. KIMMICK

2 5th today? So it would be -- it would be
3 Tuesday or -- Tuesday or Wednesday this
4 week.

5 Q. What did that training include?

6 A. A program on discriminatory
7 behavior and sexual harassment in New York
8 and New York City.

9 Q. How long is the training?

10 A. About two hours.

11 Q. Is it virtual or in person?

12 A. Virtual.

13 Q. Did you participate in a similar
14 training in 2020?

15 A. I don't recall exactly, but most
16 likely, yes.

17 Q. What is your understanding of
18 discrimination in the workplace?

19 MR. GUIFOYLE: Objection.

20 A. It is not tolerated by Orange.

21 Q. I'm sorry?

22 A. It is not tolerated by Orange or
23 me.

24 Q. What is discrimination,
25 according to your understanding?

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1 A. KIMMICK

2 of the Family Medical Leave Act.

3 A. My understanding is people
4 should have the time and the ability to
5 take time off from work if they' required
6 in order to support a family member,
7 that's my general understanding.

8 Q. Anything else?

9 A. Only how I would act.

10 Q. What do you mean by that?

11 A. Like I said, if anybody came to
12 me and asked for it, I would immediately
13 assume it was valid without question and
14 refer them to HR.

15 Q. Did Patty ask you to take time
16 off work under the FMLA, under the Family
17 Medical Leave Act?

18 A. No, not to my knowledge.

19 Q. Did she ever take any time off
20 work to care for a family member?

21 A. I believe so, yes. She asked
22 for paid leave, paid time off.

23 Q. Which family member did she take
24 time off of work to care for?

25 A. I believe it was her daughter.

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1 A. KIMMICK

2 Q. Do you know the circumstances of
3 her daughter -- of her daughter's
4 sickness?

5 A. It was quite some time ago, but
6 I believe it was an infection of some
7 kind. I don't know all of details, I
8 don't recall, but -- but I believe it was
9 an infection of some kind.

10 Q. Did Patty come to you and ask
11 you if she could take time off work to
12 care for her daughter?

13 A. As I said, yes. I believe she
14 did, yes.

15 Q. What did you do?

16 A. I gave her time off. I told her
17 to take whatever time she needed.

18 Q. Did you refer her to HR?

19 A. I didn't know that the -- the --
20 the scale or what -- or how much time she
21 needed, I just assumed that she would
22 manage that if she needed to take more
23 time off, she would come to me, and I
24 would grant paid time off up to the limit,
25 and if she -- if she decided that she

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1 A. KIMMICK

2 territory, and we sat on an annual basis
3 goals and objectives that she needed to
4 achieve, some of those were discussed in a
5 semiannual review and more detail might
6 have been provided at the time.

7 MS. FISHER: This document is
8 being marked as Kimmick 3 and it's
9 bates stamped OBS_00406 to 00407.

10 (Whereupon, a job description
11 bates stamped OBS_00406 to 00407 was
12 marked as Kimmick Exhibit 3 for
13 identification as of this date by the
14 Reporter.)

15 Q. What was Ms. Haran's title at
16 the time she was hired?

17 A. I don't recall. I believe it
18 was senior account manager farmer, but I
19 would need to validate that with HR.

20 Q. Did you ever promote her?

21 A. Not to my knowledge.

22 Q. Did you ever recommend that she
23 be given additional job responsibilities?

24 A. No.

25 Q. Did you ever recommend that she

October 05, 2023

1 A. KIMMICK

2 have responsibilities taken away?

3 A. She asked for more

4 responsibilities in a different role or a

5 different type of a role and at her

6 request I tried to make that happen. It

7 wasn't a more senior role, it -- just a

8 different set of accounts with a different

9 set of responsibilities, I did this at her

10 request, but it was not a more senior

11 role, it did not have any less or more

12 responsibility, and it was not a

13 promotion.

14 Q. How did the accounts differ?

15 A. She was hired to manage what we

16 call B-end accounts, these are accounts

17 that are headquartered outside of the

18 United States and her initial territory it

19 was typically French-based multinationals

20 who made some of their decisions in the

21 United States, those accounts were managed

22 by an account director for the most part

23 or an account manager that was outside the

24 United States who had overall

25 responsibility for the global account, her

October 05, 2023

1 A. KIMMICK
2 responsibilities were to deliver and drive
3 new business and maintain revenue streams
4 and the relationship within the United
5 States for those accounts, she requested
6 to be on accounts that allowed her to be
7 more in control of the overall
8 relationship of those accounts, she wanted
9 to be an A-end account manager on accounts
10 that she managed globally herself and so I
11 attempted to make that change for her.

12 Q. What A-end accounts were
13 assigned to her?

14 A. I don't recall all of them.

15 Q. And when did you make the
16 change?

17 A. I don't recall the exact date.

18 Q. Do you remember the year?

19 A. I believe that it was -- it was
20 -- it was the year that she departed. I
21 am not -- again, I mean, I'm not -- I'm
22 not entirely sure of the dates and the
23 reason I'm not sure of the dates is
24 because Covid played a major part in that
25 transition. She was managing a territory,

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1 A. KIMMICK

2 the blurb on Page 2?

3 A. I believe I did.

4 Q. So as of the first half of 2019,
5 Patty Haran was fully successful in her
6 job duties?

7 A. In her current territory at that
8 time she was showing appropriate results
9 for those accounts. These accounts were
10 -- were traditionally B-end accounts that
11 were being managed by a person outside of
12 the United States and Patty was the U.S.
13 representative.

14 Q. Do you see where it says "fully
15 successful"?

16 A. Yes.

17 Q. Did you write that?

18 A. Yes.

19 Q. Okay. So she was fully
20 successful in managing her accounts at
21 that time, correct?

22 A. Correct.

23 MS. FISHER: I'm going to put
24 another document in the chat.

25 Q. Just let me know when you have

1 A. KIMMICK
2 had a chance to review this other
3 document.

4 A. Okay.

5 Q. Okay. Do you recognize this
6 document?

7 A. Yes.

8 Q. What do you recognize it to be?

9 A. This appears to be Patty's
10 second half 2020 performance review.

11 Q. Did you write this?

12 A. Yes.

13 Q. Okay. And did this memorialize
14 all of the issues in her performance at
15 the time?

16 A. That's a very broad statement.
17 Can you clarify?

18 Q. Were there any other performance
19 issues that Patty exhibited that are not
20 memorialized in this blurb?

21 A. Yes.

22 Q. What were the other performance
23 issues?

24 A. There were some other behaviors
25 that I talked to her about about client

1 A. KIMMICK

2 Q. Did you address the issues with
3 Patty?

4 A. I did.

5 Q. When?

6 A. I had -- during the review
7 process and part of our weekly and monthly
8 cadences; in fact, I typically have
9 30-minute sessions with my account
10 managers, I had ended up scheduling an
11 hour or even an hour-and-a-half with Patty
12 to make sure that she understood the
13 requirements and what was going on with
14 her piers and the customers.

15 Q. What did you tell her
16 specifically about these issues?

17 A. I tried to give guidance about
18 what I thought needed to happen.

19 Q. Well, what was the issue that
20 the customer complained about?

21 A. Clarity of communication,
22 responsiveness, the ability to deliver
23 timely responses to their complaints,
24 again, all of this was hearsay.

25 Q. What do you mean by "hearsay"?

1 A. KIMMICK

2 A. This was a dialogue that was
3 between the customer and myself and that
4 needed to be shared with Patty, and I was
5 under the impression that she could
6 hopefully correct some of those issues,
7 and she didn't.

8 Q. How didn't she -- why do you say
9 she did not correct the issue?

10 A. The customer did not sign on for
11 more business, and they were -- and they
12 were, as I said in this review, hasn't
13 resulted in increased proposed services,
14 the pipeline isn't currently sufficient to
15 meet her budgets, customers were unwilling
16 to talk about new opportunities with her
17 because she was unable to address the
18 things that were their issues.

19 Q. Which customer are you talking
20 about?

21 A. I don't recall.

22 Q. We can leave a blank in the
23 record so that you can fill that in later.
24 (INSERT):_____.

25 Q. Did you speak with Patty again

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1 A. KIMMICK

2 Q. What were the issues with her
3 piers that you discussed with her?

4 A. Again, this was hearsay. I
5 don't have anything in writing. These
6 were individuals who came to me to express
7 dissatisfactions about how Patty was
8 asking for their help and the way in which
9 she pressured them to be part of the team.

10 Q. Who were the individuals who
11 expressed this to you?

12 A. I don't recall.

13 Q. Okay. We can leave a blank in
14 the record for the names of those
15 individuals as well.

16 (INSERT):_____.

17 Q. So how was it -- what was it
18 that they told you about how Patty was
19 asking for her help that was problematic?

20 A. I don't recall all of the
21 detail.

22 Q. Do you remember any of the
23 details?

24 A. These were conversations that I
25 had with them either in person or on the

October 05, 2023

1 A. KIMMICK

2 phone and it was about the way that she
3 was communicating with them that made it
4 an uncomfortable work environment.

5 Q. What about the way she was
6 communicating with them made it
7 uncomfortable?

8 A. I can't speak for them.

9 Q. Well, what did they tell you?

10 A. They were uncomfortable and that
11 I needed to speak to Patty about her
12 behavior.

13 Q. Well, what did they tell you
14 made them uncomfortable?

15 A. I can't recall the detail.

16 Q. You don't have anything in
17 writing about this issue?

18 A. No.

19 Q. And you don't have anything in
20 writing about the issues that the customer
21 had brought to you about Patty's
22 performance, correct?

23 A. No.

24 Q. Is it typically your practice to
25 memorialize in writing performance issues?

1 A. KIMMICK

2 piers, did you deem those to be factual,
3 yes or no?

4 A. It didn't matter.

5 Q. What do you mean?

6 A. When somebody comes to me with
7 an issue that says that somebody on the
8 team is uncomfortable and it's reported to
9 me, as her manager, leading by example, I
10 want to make sure that everybody on the
11 team has a mission that understands the
12 direction and the goals associated with
13 what needs to happen on the team and if
14 that is being distracted in any way by the
15 way that somebody is asking for work to be
16 done or how these things are being
17 approached then I want to make sure that
18 everyone on the team has a common
19 direction and is a productive employee,
20 and I would love to have everybody on the
21 team be happy and productive.

22 Q. Okay. Were issues from her
23 piers reported to you on more than one
24 occasion?

25 A. Yes.

1 A. KIMMICK

2 Q. Were they reported to you by
3 more than one person?

4 A. Yes.

5 Q. And yet you didn't see it fit to
6 document any of that?

7 A. It was not a hostile work
8 environment, these were behaviors.

9 Q. All right. So something would
10 have to be a hostile work environment for
11 you to document it, yes or no?

12 A. Yes.

13 Q. Okay.

14 A. Well, I did document this in her
15 review.

16 Q. That she was having problems
17 with her piers?

18 A. I believe in one of her reviews
19 I made a comment with customers and piers,
20 yes, I did. I would imagine that it came
21 up, it had to have. If it didn't come up
22 in writing it would certainly come up as a
23 verbal discussion.

24 Q. But you didn't document it in
25 this -- in this document that's here --

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1 A. KIMMICK

2 to June 30th, 2020.

3 (Whereupon, a performance review
4 bates stamped OBS_00334 and 00343 was
5 marked as Kimmick Exhibit 6 for
6 identification as of this date by the
7 Reporter.)

8 Q. Could you review this and let me
9 know when you are done, please?

10 A. Okay.

11 Q. What was -- is this Patty's
12 performance review for the time period of
13 January 1st, 2020 to June 30th, 2020?

14 A. Yes.

15 Q. Did you write this performance
16 review for her?

17 A. Yes.

18 Q. Did you discuss this performance
19 review with her?

20 A. Yes, I did.

21 Q. Okay. And what was her overall
22 rating for this performance review?

23 A. Fully successful.

24 MS. FISHER: And this document
25 is bates stamped OBS_335 through 343.

1 A. KIMMICK

2 between what I said in the redacted
3 document and this one.

4 Q. Let me just ask you: Is this
5 the performance review for the time period
6 of July 1st, 2020 to December 31st, 2020?

7 A. It appears so, yes; however, the
8 manager's comments look to be the same as
9 the ones on the redacted document.

10 Q. Are you done reviewing this?

11 A. Yes.

12 Q. Okay. What is the overall
13 rating that Patty received on this
14 performance review?

15 A. Improvement needed.

16 Q. All right. And did you
17 determine that improvement was needed?

18 A. Yes.

19 Q. Is this a performance review
20 that you filled out for Patty?

21 A. Yes.

22 Q. Did you discuss it with her?

23 A. Yes.

24 Q. When did you discuss it with
25 her?

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1 A. KIMMICK

2 this document. I couldn't personally
3 testify to that, no, but this is what it
4 says in the document. I'm assuming that
5 that is the date.

6 Q. Did you memorialize the reasons
7 form Ms. Haran's termination in any
8 document?

9 A. Not that I recall.

10 Q. What were the reasons for her
11 termination?

12 A. That's a very broad question.
13 Can you be more specific?

14 Q. Why did you decide to terminate
15 Ms. Haran?

16 A. Nonperformance.

17 Q. What specifically?

18 A. As documented in her review, she
19 was unable to produce enough business for
20 the -- enough new pipeline for the
21 business to be healthy in the future, the
22 opportunities were not moving through the
23 -- the pipeline in a sufficient velocity,
24 and she had issues with her piers and
25 customers.

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1 A. KIMMICK

2 Q. The issues with her piers and
3 customers are the issues that you don't
4 recall that you testified to earlier?

5 A. That is correct, and I believe
6 in one of the documents that you had sent,
7 I believe this is the performance review
8 from -- sorry, I have to go back to look
9 at the actual performance review again.
10 One of the reviews I said she had issues
11 with her piers and that that was feedback
12 from her customers. I am looking for it
13 in the documents.

14 Q. Well, I can make it easy, so the
15 --

16 A. So I said, "She has not yet
17 built an agreed consensus on strategy with
18 her team in response to these difficult
19 situations, and this has lead to some
20 miscommunication. There was also a
21 miscommunication with a client" --

22 Q. Are those the issues --

23 A. -- "These episodes results some
24 concern that Patty may not be fully
25 understanding feedback, or has not had the

1 A. KIMMICK

2 time to 'read between the lines'

3 regarding indirect or nonverbal cues which

4 are critical for a sales leader."

5 Q. So are these the issues that are

6 referring to when you made the decision to

7 terminate her?

8 A. This is one of the many.

9 Q. Okay. Are there any other pier

10 and customer issues that you considered

11 when making the decision to terminate her

12 that are not reflected on that performance

13 review?

14 A. This performance review is a

15 generalization of performance overall and

16 there was -- those situations were

17 addressed as they came up; and, no, there

18 is no documentation.

19 Q. Did you give Patty a quota for

20 2021?

21 A. Yes.

22 Q. When did you give her a quota

23 for 2021?

24 A. So I believe for 2021 she had --

25 she had at least two territories so she

1 A. KIMMICK
2 B-end account manager because she had less
3 responsibility, and she was -- it was a
4 slightly different kind of a territory
5 from a communication requirements
6 perspective that her performance clearly
7 was more ineffective as an A-end account
8 manager.

9 Q. So let's take her B-end
10 performance, how was her performance on
11 her B-end accounts as of February of 2021?

12 A. I believe in February of 2021
13 she had responsibilities for both.

14 Q. How was her performance on her
15 B-end accounts as of February of 2021?

16 A. I can't recall.

17 Q. Were there any deals she failed
18 to close on her B-end accounts?

19 A. I can't recall.

20 Q. Were there any deals on her
21 A-end accounts that she failed to close?

22 A. I can't recall that detail.

23 Q. When you testified earlier that
24 based on her pipeline she would not have
25 made the budget, what do you mean by that?

1 A. KIMMICK

2 A. She identified pipeline, and she
3 had identified opportunities with some
4 customers, but those opportunities were
5 not maturing, they weren't moving through
6 the pipeline, they weren't being proposed
7 or negotiating, they weren't moving
8 towards closure and, therefore, there was
9 a low expectation that she would make her
10 target and, therefore, make the needs of
11 the business and, yeah, I mean, these --
12 the projects she was working on were long
13 shots, and she wasn't doing what was
14 necessary to move them forward.

15 Q. Did she have a chance to do that
16 before she was terminated?

17 A. That's the job.

18 Q. Well, when she --

19 A. That's what an account manager
20 is hired to do.

21 Q. When she presented her plan to
22 you to increase her pipeline from that
23 time until the time she was terminated,
24 did she have an opportunity to pursue the
25 opportunities she outlined?

1 A. KIMMICK
2 was beyond a normal injury, right, but
3 there was no way for me to know what those
4 procedures might be or how severe it was.

5 Q. Were you -- did Patty tell you
6 she needed to take time off work on an
7 ongoing basis for her daughter?

8 A. She said she needed to take some
9 time off, and I told her take whatever
10 time she needed.

11 Q. Okay. In 2021, during the
12 months of January and February while she
13 was still employed, did she inform you
14 that she needed to take any more time off
15 work for her daughter?

16 A. I can't recall the dates. I
17 don't believe that she sent me anything in
18 writing.

19 Q. Did you ask her to send you
20 anything in writing?

21 A. No. I told her to take whatever
22 time she needed. She was -- she was
23 having difficulty with her daughter, and I
24 wanted her to be doing what she needed to
25 do for her family.

1 A. KIMMICK

2 MS. FISHER: Okay. I just put
3 another document in the chat. This
4 will be Kimmick 16 and bates stamped
5 OBS_0575 to 576.

6 (Whereupon, a chat bates stamped
7 OBS_00575 to 00576 was marked as
8 Kimmick Exhibit 16 for identification
9 as of this date by the Reporter.)

10 Q. Just let me know when you have
11 had a chance to review this.

12 A. Okay. So this looks like I -- I
13 more than likely called Eddi to tell her
14 what's happening based on the training
15 class.

16 Q. Okay. Hold on. Let me just ask
17 some specific questions. You recognize
18 this?

19 A. No, but it -- it appears to be a
20 text conversation between me and Patty.

21 Q. Okay. And the date of the
22 conversation is October 8th, 2020 as
23 reflected on this document; is that
24 correct?

25 A. Yes.

1 A. KIMMICK

2 Q. And in this conversation you
3 state at 3:06 p.m., "I'll let Eddy know"
4 in response to Patty telling you that she
5 needs to take time off work for her
6 daughter's surgery, correct?

7 A. She says her daughter's
8 situation, she doesn't say surgery, and
9 she asked me whether she -- she should let
10 Eddi know about whether somebody else
11 should fill the spot, and I told her at
12 time that I haven't told Eddi or anyone
13 about her daughter yet, and I told her
14 obviously, here, I said, that if you can't
15 join, I will let him know, and he would
16 understand, I'm sure he did, and I told
17 her to take the time.

18 Q. Right. Do you see the --

19 A. And I --

20 Q. Sorry. Go ahead.

21 A. Okay.

22 Q. Do you see at 3:06 where she
23 wrote, "me either. he just needed to
24 fill some training spots so he asked and
25 at that time I thought I could participate

1 A. KIMMICK

2 but today we found out she will need
3 surgery and it will likely be on wed," do
4 you see that?

5 A. I do.

6 Q. Okay. So she did inform you
7 that her daughter would need surgery?

8 A. It appears so, yes.

9 Q. And then in response you wrote,
10 "just take the time Patty I'll let Eddy
11 know;" and then after that you wrote,
12 "just called Eddy," do you see that?

13 A. Yes.

14 Q. So, in fact, you spoke to Eddi
15 about Patty taking time off work for her
16 daughter's illness?

17 A. This seems all in line. I don't
18 -- I mean, I didn't recall it at the time,
19 but this sounds like something I would do,
20 absolutely.

21 Q. When -- actually, who
22 participated in the decision to terminate
23 Ms. Haran?

24 A. It was me, and I conferred with
25 Eddi and Jen Lawson and it had to be

1 A. KIMMICK

2 form. The recommendation or the
3 decision? You asked for both in that
4 question.

5 MS. FISHER: Okay. Well, let me
6 break it down.

7 Q. So when did you make the
8 recommendation that she be terminated?

9 A. I don't recall the date.

10 Q. When was the decision made to
11 terminate her?

12 A. I don't recall the actual date.

13 Q. Did you have a meeting jointly
14 with Eddi and Jen Lawson about Ms. Haran's
15 termination?

16 A. I don't recall if we were all on
17 the same call at once.

18 Q. What did you tell Eddi were the
19 reasons why you recommended Ms. Haran's
20 termination?

21 A. She was a -- a person who is not
22 creating enough volume for the future
23 business, that she had issues with her
24 team and with her clients, and that she
25 was continually on the bottom of the list

1 A. KIMMICK
2 for people who are having difficulty and
3 having performance issues, not just
4 meeting the target, but also making sure
5 that the business is healthy and were
6 maintaining good relationships and leading
7 a global team.

8 Q. What list are you referring to?

9 A. All of the people on my team.

10 Q. Is there an actual list that you
11 have that she was on the bottom of?

12 A. No.

13 Q. And when you say she was on the
14 bottom of the list, is that in terms of
15 her quota, meeting her quota?

16 A. No, not that alone.

17 Q. What else are you talking about?

18 A. I believe I already answered
19 that question.

20 Q. Well, let me ask it again.

21 MR. GUIFOYLE: I will object to
22 the extent it has been asked and
23 answered.

24 Q. What -- how else was she on the
25 bottom of the list?

1 A. KIMMICK

2 A. Her interactions with her piers
3 and her customers, the issues that she had
4 had with her piers and her customers, and
5 the impact that her work was having on the
6 act to deliver the results that the
7 business expected in the future.

8 Q. What impact was her work having
9 on the ability to deliver the results that
10 the business expected in the future?

11 A. Insufficient.

12 Q. Was there anything else that put
13 her on the bottom of the list?

14 A. No.

15 Q. In 2019 when she was fully
16 successful, was she at the bottom of the
17 list?

18 A. If not at the bottom, it was
19 close, and I would say that this is a --
20 this is a discussion between me and my
21 manager that was referring to personnel
22 issues, not a formal process.

23 Q. What do you mean?

24 A. He asked on a regular basis are
25 these the right people to achieve our

1 A. KIMMICK

2 results, do you have the right people to
3 achieve the results and, of course, it
4 takes time and effort to replace
5 individuals and that can be very difficult
6 to choose to let somebody go; but in this
7 case, she continually appeared at the
8 bottom and Eddi and I came to the
9 conclusion that we should probably try to
10 manage her out of the business. This
11 discussion happened, as I said, it
12 probably began earlier than the Summer of
13 2020, and I don't know when the decision
14 was made in fact.

15 Q. Did anyone replace Patty?

16 A. Her territory was split up into
17 pieces and so nobody took exactly the same
18 territory that she had, no.

19 Q. Had any other employees who have
20 reported to you at Orange complained about
21 discrimination?

22 A. No, not to my knowledge.

23 Q. Have any employees who report to
24 you complain about violations with the
25 Family Medical Leave Act?

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1 A. KIMMICK

2 A. No, not to my knowledge.

3 MS. FISHER: All right. Let's
4 take a quick break. I'm going to
5 review my outline. I might be done.
6 If not, we're close. Let's come back
7 in, I think, five minutes should be
8 fine so 2:20.

9 MR. GUIFOYLE: Okay.

10 (Whereupon, a short recess was
11 taken.)

12 MS. FISHER: I have put another
13 document in the chat. I think this is
14 Kimmick 17 and it's marked OBS_00982
15 to 938.

16 (Whereupon, handwritten notes
17 bates stamped OBS_00982 to 00938 were
18 marked as Kimmick Exhibit 17 for
19 identification as of this date by the
20 Reporter.)

21 Q. Would you take a look at this
22 document and let me know when you are
23 done?

24 A. Okay.

25 Q. Do you recognize this?

CHANGES AND SIGNATURE PAGE

WITNESS NAME: ADAM OVERTON KIMMICK

DATE OF DEPOSITION: October 5, 2023

PAGE / LINE	CHANGE	REASON FOR CHANGE
9:12	Change “Eddi” to “Eddy”	Transcription Error / Word
9:13	Change “E-d-d-i-Y-o-u-k-h-a-n-n-a” to “E-d-d-y-Y-o-u-k-h-a-n-n-a”	Transcription Error / Word
9:25	Change “Eddi” to “Eddy”	Transcription Error / Word
10:16	Change “Eddi” to “Eddy”	Transcription Error / Word
16:3	Change “Eddi” to “Eddy”	Transcription Error / Word
18:8, 9, 18, 22	Change “Eddi” to “Eddy”	Transcription Error / Word
19:8	Change “piers” to “peers”	Transcription Error / Word
19:9, 10	Change “Eddi” to “Eddy”	Transcription Error / Word
23:24	Change “Eddi” to “Eddy”	Transcription Error / Word
42:13	Change “Tabool” to “Teboul”	Transcription Error / Word
50:8, 13, 17	Change “Eddi” to “Eddy”	Transcription Error / Word
50:18	Change “she” to “we”	Transcription Error / Word
54:24	Change “piers” to “peers”	Transcription Error / Word
69:2	Change “sat” to “set”	Transcription Error / Word
76:3	Change “piers” to “peers”	Transcription Error / Word
77:14	Change “piers” to “peers”	Transcription Error / Word
85:19	Change “piers” to “peers”	Transcription Error / Word
98:24	Change “piers” to “peers”	Transcription Error / Word

99:11	Change “piers” to “peers”	Transcription Error / Word
114:9	Change “reviewed” to “renewed”	Transcription Error / Word
114:16	Change “seven” to “several”	Transcription Error / Word
116:2	Delete “is” before “of”	Transcription Error / Word
120:9	Change “possibly” to “possibility”	Transcription Error / Word
121:25	Change “I” to “I’ve”	Transcription Error / Word
123:15	Delete “or” before “a”	Transcription Error / Word
134:10	Change “piers” to “peers”	Transcription Error / Word
135:9	Change “to” to “for”	Transcription Error / Word
136:18	Delete “send” before “sent”	Transcription Error / Word
139:17, 20	Change “Eddi” to “Eddy”	Transcription Error / Word
140:2	Change “have” to “had”	Transcription Error / Word
143:13	Change “Eddi” to “Eddy”	Transcription Error / Word
144: 3, 10, 12	Change “Eddi” to “Eddy”	Transcription Error / Word
145: 14, 25	Change “Eddi” to “Eddy”	Transcription Error / Word
146: 16, 19	Change “Eddi” to “Eddy”	Transcription Error / Word
150: 14, 18	Change “Eddi” to “Eddy”	Transcription Error / Word
152:2, 4	Change “piers” to “peers”	Transcription Error / Word
153:8	Change “Eddi” to “Eddy”	Transcription Error / Word

A. KIMMICK

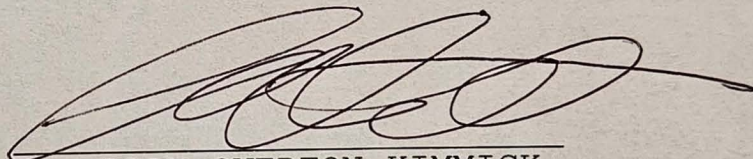
Q. Mr. Kimmick, thank you for your time here today.

A. Okay.

THE REPORTER: Counsel, are you ordering a copy of the transcript?

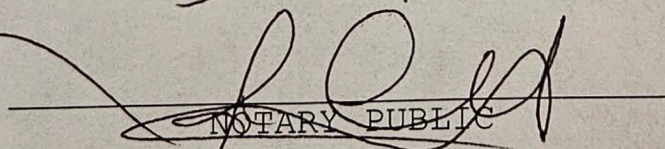
MR. GUIFOYLE: I'll take an electronic copy.

(Whereupon, at 2:22 p.m., the examination of this witness was concluded.)

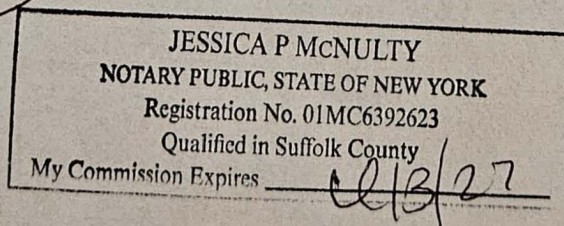


ADAM OVERTON KIMMICK

Subscribed and sworn to before me
this 13 day of November, 2023.



NOTARY PUBLIC



October 05, 2023

C E R T I F I C A T E

STATE OF NEW YORK)

ss.:

COUNTY OF NEW YORK)

I, STEFANIE CALABRIA, a Notary
Public for and within the State of New
York, do hereby certify:

That the witness whose
examination is hereinbefore set forth was
duly sworn and that such examination is a
true record of the testimony given by that
witness.

I further certify that I am not
related to any of the parties to this
action by blood or by marriage and that I
am in no way interested in the outcome of
this matter.

IN WITNESS WHEREOF, I have
hereunto set my hand this 5th day of
October, 2023.



STEFANIE CALABRIA

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